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Draft Chesapeake Bay Total Maximum Daily Load

Comment On: EPA-R03-OW-2010-0736-0001
Clean Water Act Section 303(d): Notice for the Public Review of the Draft Total Maximum Daily Load (TMDL) for the Chesapeake Bay

Document: EPA-R03-OW-2010-0736-0305
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Submitter Information

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General Comment

It is the position of Virginia American Water (VAW) that it is best to incorporate the recommendations of the Watershed Implementation Plan (WIP). However, there is also a need to make sure that a scientifically sound method for eutrophic measurement is implemented to monitor the status of algae blooms. Due to the hottest summer on record this year, large levels of algae blooms were found at or nearby our driinking water intake on the Appotmattox River. These algae had the component MIB (2-methyl isoborneol). Even at maximum optimization of the drinking water process, only up to 65% of MIB was removed. The maximum level of MIB found in the river throughout the summer was 1253 ng/L. It should be noted that the accepted threshold for human detection concerning taste and odor problems in drinking water is 10 ng/L.

In addition, the position of VAW concurs with HRWTF that the EPA "Backstop" allocations are unfair, in that the nutrient compliance goals should focus more on reducing Nonpoint Source discharges, rather than increased reductions to Virginia's WIP POTW. The proposed EPA "Backstop" allocations would force HRWTF to implement very costly advanced treatment technologies that may or may not achieve the desired goal. The advanced treatment technologies may prove to be so costly that Industrial customers would be placed in a non-competitive disadvantaged situation, and have no choice other than to shut down operations. It is hoped that a resolution can be found that would help to reduce the nutrients that promote algae, at a fair and reasonable cost associated for the equipment and technologies needed to reach the desired goal.